

# CLEARY GOTTlieb STEEN & HAMILTON LLP

ONE LIBERTY PLAZA  
NEW YORK, NY 10006-1470  
(212) 225-2000  
FACSIMILE (212) 225-3999  
WWW.CLEARYGOTTLIEB.COM

WASHINGTON, DC • PARIS • BRUSSELS • LONDON • MOSCOW  
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG  
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Writer's Direct Dial. +1 212 225 2508  
E-Mail: cboccuzzi@cgsh.com

LAURENT ALPERT  
VICTOR I. LEWKOW  
LESLIE N. SILVERMAN  
ROBERT L. TORTORIELLO  
LEE C. BUCHHEIT  
JAMES M. PEASLEE  
THOMAS J. MOLONEY  
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JONATHAN I. BLACKMAN  
MICHAEL L. RYAN  
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LEV L. DASSIN  
NEIL Q. WHORISKEY  
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DAVID LEINWAND  
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MICHAEL J. VOLKOVITSCH  
MICHAEL D. DAYAN  
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KIMBERLY BROWN BLACKLOW  
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SUNG K. KANG  
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FRANCESCA L. ODELL  
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CAROLINE F. HAYDAY  
DAVID FLECHNER  
RESIDENT COUNSEL  
LOUISE M. PARENT  
OF COUNSEL

August 20, 2015

BY EMAIL AND ECF

Honorable Thomas P. Griesa  
United States District Court for  
the Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *NML Capital, Ltd. v. Republic of Argentina*, No. 08 Civ. 6978 (TPG), and  
related cases

Dear Judge Griesa:

I write in connection with Your Honor's August 12, 2015 Order in the above-captioned matters, in which Your Honor Ordered, *inter alia*, that the Republic of Argentina (the "Republic") "prepare and deliver within 10 days of today a privilege log on a document-by-document basis." ECF No. 814. Under the current schedule, that privilege log is due this coming Monday, August 24, 2015.

We write to request a brief, one-week extension of that deadline, to August 31, 2015. We need the additional time given the lengthy time period covered by plaintiffs' demands with the resulting amount of document review that needs to occur. Plaintiffs have informed us that they do not object to our request for this one additional week, and have asked that we attach to this letter their email to us setting out their non-objection. *See* Email from R. Cohen to C. Boccuzzi, dated Aug. 20, 2015.

We respectfully requests that the Court so-order the proposed schedule.

Respectfully submitted,

  
Carmine D. Boccuzzi

Attachment

cc: Counsel of Record (via Email and ECF)

SO ORDERED:

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U.S.D.J.

**From:** Cohen, Robert [<mailto:robert.cohen@dechert.com>]  
**Sent:** Thursday, August 20, 2015 1:26 PM  
**To:** Boccuzzi Jr., Carmine D.  
**Cc:** Friedman, Edward A.  
**Subject:**

Dear Carmine,

With respect to your request for a two week extension of time to provide the privilege log, as you know the Court's August 12<sup>th</sup> Order provided, in part, as follows:

4       .....     The  
5     Court further holds that if the Republic is claiming a  
6     privilege as to any documents or information required to be  
7     produced under the discovery order of September 25, 2013, it is  
8     directed to prepare and deliver within 10 days of today a  
9     privilege log on a document-by-document basis. Failure to do  
10    so will be deemed to be a waiver of the claim of privilege.

Plaintiffs are not willing to stipulate to changes in the Court's Order. The 10-day period per the Court order ends on Saturday, August 22, so the Republic's privilege log is due Monday, August 24. If you apply to the Court for an extension, you have our permission to provide a copy of this email to the Court and advise the Court that plaintiffs would not object to a one-week extension to Monday, August 31.

Regards,

Robert

**From:** Boccuzzi Jr., Carmine D. [<mailto:cboccuzzi@cgsh.com>]  
**Sent:** Wednesday, August 19, 2015 12:38 PM  
**To:** Cohen, Robert; [efriedman@fklaw.com](mailto:efriedman@fklaw.com)  
**Cc:** Northrop, Daniel J.  
**Subject:** Argentina Cases

Dear Robert and Ed:

I write to request a brief extension, to Friday, September 4, to provide to you the privilege log requested by plaintiffs and ordered by Judge Griesa during the August 12 hearing. Please let me know whether you agree to this extension. Thank you.

Regards,  
Carmine

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